



**PHILIP A. HUNT CHEMICAL CORPORATION**  
**ORGANIC CHEMICAL DIVISION**

September 2, 1982

Mr. Dennis Huebner, Chief  
Waste Management Branch  
U.S. Environmental Protection Agency  
JFK Building  
Boston, MA

RCRA RECORDS CENTER  
FACILITY OLIN HUNT SPECIALTY  
ID. NO. RID095976544  
FILE LOC. P-1A  
OTHER \_\_\_\_\_

Dear Mr. Heubner:

Please be advised that it is the intent of this firm to immediately withdraw its hazardous waste storage facility status (Part A Applications) for the following locations:

- 1) Philip A. Hunt Chemical Corporation  
One Wellington Road  
Lincoln, Rhode Island  
EPA ID # - RID095976544
- 2) Philip A. Hunt Chemical Corporation  
Industrial Circle  
Lincoln, Rhode Island  
EPA ID # - RID001202589

We will be converting the container storage areas at each facility to generator status (less than 90 day storage) as soon as the Rhode Island Department of Environmental Management approves closure plans for each container storage area.

In our Part A applications we indicated that storage of hazardous waste would also take place in tanks. Although our intent at the time was to store in tanks, this type of storage never took place at either facility. Based on this fact and our reversion to less than 90 day container storage, we hereby request that our Part A's for each facility as mentioned above be considered officially withdrawn.

We have elected to revert from storage status to generator status to be exempt from RCRA permit requirements.



PHILIP A. HUNT CHEMICAL CORPORATION

Please contact me at (401) 333-6114 if you have any questions concerning this letter.

Sincerely,

*Stephen Pozner*

Stephen Pozner  
Safety/Environmental Engineer

# AE & T

APPLIED ENVIRONMENTAL TECHNOLOGIES CORPORATION  
Administration Bldg. 7, Rm. 240, Davisville, Rhode Island 02854 / (401) 294-4622

Professional Civil, Chemical, Environmental Engineers and Scientists

Received PCB 9/23/82

22 SEP 1982

September 15, 1982

MAILED

9/17/82

FRO.

Mr. Richard Boynton, Chief  
Permits Branch  
U.S. Environmental Protection Agency  
JFK Building  
Boston, MA 02203

Re: Phillip A. Hunt Chemical Corporation (Hunt),  
One Wellington Road, Lincoln, Rhode Island,  
EPA ID No. RID095976544.

RCCA RECORDS CENTER  
FACILITY OLIN HUNT SPEC  
ID NO. RID 095976544  
FACILITY C. R-1B  
OTHER

Dear Mr. Boynton:

We are submitting this correspondence and accompanying documents in accordance with our telephone conversation on September 10th.

As indicated in the attached letter from Mr. Robert Matte of Hunt, that firm is requesting that EPA withdraw its call for a Part B application for the abovementioned facility.

Our firm has prepared and submitted a Closure Plan for the hazardous waste container storage area at this facility to the Rhode Island Department of Environmental Management on September 8th for review and approval. This Closure Plan indicated that Hunt has already reverted to generator status as of August 30, 1982. Currently and in the future, no containers of hazardous waste will be allowed to accumulate at this facility for periods exceeding 90 days. In addition, hazardous waste is not accepted from off-site locations.

As indicated in paragraph three of Hunt's September 2nd letter to Dennis Huebner (copy enclosed), hazardous waste storage never took place in tanks as originally indicated in this facility's Part A application.



Please find enclosed copies of the Closure Plan submitted to RIDEM, closure certifications, survey plan and copies of all related correspondence regarding this facility.

Please contact myself or John Spirito at this office if you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas J. Dolce", with a stylized flourish at the end.

Thomas J. Dolce, P.E.  
Principal Engineer

Enclosure

cc: S. Pozner, Hunt  
T. Wright, DEM



**PHILIP A. HUNT CHEMICAL CORPORATION**  
**ORGANIC CHEMICAL DIVISION**

RCA RECORDS CENTER  
FACILITY OLIN HUNT SPECIALTY  
I.D. NO. RID095976544  
FILE LOC. R-16  
OTHER \_\_\_\_\_

September 10, 1982

Mr. Richard Boynton, Chief  
Permits Branch  
U.S. Environmental Protection Agency  
JFK Building  
Boston, MA 02203

Subject: Request for Withdrawal of EPA Call for Part  
B Permit Application for Our Limerock Facility,  
EPA ID# RID095976544.

Dear Mr. Boynton:

It is hereby respectfully requested that EPA withdraw its  
call for hazardous waste Part B Permit application for the  
following facility:

Philip A. Hunt Chemical Corporation  
One Wellington Road  
Lincoln, Rhode Island  
EPA ID# - RID095976544

We have reverted to less than 90 day storage (generator  
status) at this facility, and therefore understand that a  
hazardous waste permit is not required.

Please contact our consultant, Applied Environmental  
Technologies Corporation (401) 294-4622 if you have  
any questions concerning this matter.

Sincerely,

*Robert Matte*

(SP)

Robert Matte  
Chief Engineer



to part 8/16/80

RI D095976544

**PHILIP A. HUNT CHEMICAL CORPORATION**  
**ORGANIC CHEMICAL DIVISION**

August 14, 1980

EPA-Region I  
Permits Branch  
P. O. Box 8748  
Boston, MA 02114

RCRA RECORDS CENTER  
FACILITY OLIH HUNT SPECIALTY  
I.D. NO. RI D 095976544  
FILE NO. C. R-1A  
OTHER \_\_\_\_\_

Gentlemen:

We are contemplating whether or not to file the application for a permit to be a treatment facility. We believe that our facility comes under the definition of "totally enclosed treatment facility." According to the definition of "totally enclosed treatment facility" in 40 CFR 260.10, we may be excluded from the requirement to obtain a permit if we fall under the definition.

At our two Lincoln, Rhode Island plants, we are mixing waste solvents (e.g. xylene) with number six fuel oil and then using it as fuel to our boilers. We are also burning waste solvents neat. Chemically, the waste solvents consist of carbon, hydrogen, and oxygen, and after combustion there are no residues or hazardous waste remaining.

Please advise us as to what type of treatment facility we are. If we are not considered a totally enclosed treatment facility, what can we do to become one? If you have any questions, please call me.

Sincerely yours,

PHILIP A. HUNT CHEMICAL CORPORATION  
ORGANIC CHEMICAL DIVISION

Stephen Pozner  
Safety/Environmental Engineer

SP/mc



**AE & T**

**APPLIED ENVIRONMENTAL TECHNOLOGIES CORPORATION**  
Administration Bldg. 7, Rm. 240, Davisville, Rhode Island 02854 / (401) 294-4622

*Professional Civil, Chemical, Environmental Engineers and Scientists*

September 2, 1982

Mr. Dennis Huebner, Chief  
Waste Management Branch  
U.S. Environmental Protection Agency  
JFK Building  
Boston, MA

Re: Withdrawal of TSDF status

Dear Mr. Huebner:

RCRA RECORDS CENTER  
FACILITY OLIN HUNT SPECIALTY  
I.D. NO. RID 095976544  
FILE LOC. R-1B  
OTHER \_\_\_\_\_

We have been retained by the Philip A. Hunt Chemical Corporation (Hunt) to prepare closure plans for submission to the Rhode Island Department of Environmental Management, for their two hazardous waste drum storage facilities in Lincoln, Rhode Island. Hunt maintains drum storage facilities at their Limerock plant (EPA ID # RI 095976544), and at their Saylesville Plant (EPA ID # RID001202589).

It is the intent of Hunt to revert the status of both of the aforementioned facilities from hazardous waste container storage facilities (storage > 90 days) to on-site generator status facilities (storage < 90 days). In doing so, these drum storage operations will no longer be subject to RCRA permit requirements. Said permit applications would have been due at EPA on or about September 10th, 1982.

In discussing this reversion from storage status to generator status with EPA officials, specifically a Mr. Michael O'Brien, it was learned that a closure plan submission to EPA would not be required. Nevertheless, the RIDEM does require such, and therefore we will be submitting complete closure plans to that agency for review and approval. (Please note that both facilities have been previously inspected by EPA, specifically by Mr. Stephen Fradkoff).

In summary, the intent of this letter is to advise your office of Hunt's plan to revert both its Limerock and Saylesville container storage facilities to generator status. In doing so, it is Hunt's understanding that the RCRA storage permits that were due to be submitted on or



about September 10th, 1982 will no longer be required.

Please advise this office if any of the above summarized conclusions are incorrect, or if you have any questions regarding this matter.

Please find enclosed a letter from Mr. Stephen Pozner of Hunt, officially withdrawing their hazardous waste container storage facility status for the aforementioned locations.

With best regards,

A handwritten signature in dark ink, appearing to read "Thomas J. Dolce", with a long horizontal flourish extending to the right.

Thomas J. Dolce, P.E.  
Principal Engineer



REPORT OF PHONE CALL  
VISIT

In \_\_\_\_\_ Out \_\_\_\_\_

Date 9/10/82 Time \_\_\_\_\_

RCRA RECORDS CENTER  
FACILITY OLM HUNT SPECIALTY  
I.D. NO. RID 095976544  
FILE LOC. R-1B  
OTHER \_\_\_\_\_

File Hunt Chemical

Routing Rich  
Frank  
Mike

Person Contacted Tom Dolce AE 3 T

Phone No. 401/294-4622

Location Davisville R.I.

Subject Hunt Chemical - RID095976544; RID001202589

Summary Response to Part B request, due Sept 10.

Tom Dolce will put together two packages for Hunt facilities with specific operating details and dates when they went to <del>at</del> 90 day storage; also will include any certifications and closure plans

I told Tom if the state has approved a closure plan and it is cert. complete we will respond by returning application and with diswary B request.

If state has not approved but date is imminent we will wait ~~today~~ ~~response~~ ~~time~~ until state has approved and cert complete before sending back.

Action Required Tom will send in packages next week

Dick B.

Signature



REPORT OF PHONE CALL  
VISIT

In \_\_\_\_\_ Out \_\_\_\_\_

Date 9/10/82 Time 2:20 pm

*NAC*

File Hunt Chemical

Routing Roth  
Fraught  
Wihle.

Person Contacted Steve Pognier

Phone No. 401-333-6114

Location Hunt Chemical - RID095976544; RID001202589

Subject Response to our application request.

Summary I instructed Pognier to respond to our application request letters separately for the <sup>above</sup> ~~above~~ facilities.

In ~~one~~ <sup>each</sup> case he will send in a cert. that he has gone to ~~90~~ day and specify date; also send closure plan and any schedules in closure. (Linwood, Wellington)

In the case where he has gone to ~~90~~ day storage he will send in a cert. of the date when he <sup>Logan will</sup> went to ~~90~~ day storage and the closure plan which specifies the date for closure. We will check with state and; either send back application or wait till state cert's closure then send back application. In each case we will make a determination and respond to the application request submittal.

Action Required Get these files in shape i.e. telephone memo trip report; inspection reports, so that we can tell what the hell's going on & ~~Post request letter~~

Dick B.

Signature



F.C.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

June 24, 1982

Mr. Robert Matte  
Hunt Philip Chemical Corp.  
Industrial Circle  
1 Wellington Road  
Lincoln, RI 02856

RCRA RECORDS CENTER  
FACILITY OLIN HUNT SPECIALTY  
I.D. NO. RI 095976544  
FILE LOC. R-1B  
OTHER [for assurance]

Re: EPA I.D. No. 095976544

Dear Mr. Matte:

You previously received a letter from the U.S. Environmental Protection Agency (EPA) requesting a submittal of your Part B application to the Environmental Protection Agency. I am writing you to make you aware of two recent EPA amendments to the RCRA regulations. On April 7, 1982, EPA published requirements for owners or operators of hazardous waste management facilities to demonstrate financial responsibility for the costs of closure and post-closure care 47 FR 15032. On April 16, 1982, EPA published third party liability coverage requirements for owners or operators of hazardous waste management facilities 47 FR 16544.

The purpose of this letter is to summarize the current EPA Region I requirements and procedures for compliance with the above financial assurance and liability insurance regulations. Some key points to keep in mind are:

1. STATE REQUIREMENTS: All the states in Region I (MA, CT, RI, ME, NH and VT) have received phase I interim authorization which is, among other things, the authority to regulate existing hazardous waste treatment, storage and disposal facilities in lieu of EPA. This means new EPA regulations such as those referenced above do not automatically become law in every state. The state as the primary regulatory agency, will notify you when you will be required to submit evidence of financial assurance and liability insurance to the state.
2. EPA REQUIREMENTS. Existing facilities in Region I are not required by EPA Region I to obtain financial assurance and liability insurance or to submit any documentation in this area to EPA Region I except for those existing facilities that have been notified by EPA through certified mail to submit the Part B of their permit application or have voluntarily submitted Part B's. Those facilities should follow the procedures outlined in the following sections entitled EPA Permit Requirements - Closure and Post-Closure Financial Assurance and Liability Insurance.

The following information is intended to describe the general procedures to be followed to comply with EPA's financial requirements where permits are being issued for new facilities or for existing facilities where permits have been called.



# 1. EPA Permit Requirements - Closure and Post-Closure Financial Assurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you will be required to submit information that demonstrates that you are financially capable of bearing the costs of closing your facility. In addition, if you own or operate a disposal facility, you also must submit information that demonstrates that you are capable of covering the costs of post-closure care of your facility.

Both new and existing facilities must submit in unexecuted form the appropriate documentation, as specified in the EPA regulations, to the EPA Regional Office along with your permit application. Existing facilities must submit executed documentation to EPA before the permit will be issued. New facilities must submit the executed documentation to EPA 60 days before hazardous waste is first received at the facility. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- o a trust agreement;
- o a surety bond;
- o a letter of credit, including a trust agreement;
- o a certificate of insurance;
- o a letter from your firm's chief financial officer; and a special report and a report of examination from an independent certified public accountant; or
- o a corporate guarantee.

# 2. EPA Permit Requirements - Liability Insurance

As an owner or operator of a new or existing hazardous waste treatment, storage, or disposal facility you will be required to demonstrate that you have liability insurance for sudden accidental occurrences at your facility. In addition, if you own or operate a landfill, surface impoundment, or land treatment facility, you will be required to demonstrate that you have liability insurance for nonsudden accidental occurrences at your facility.

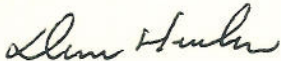
You may use either an insurance policy or a financial test to demonstrate third party liability coverage. Both new and existing facilities must submit the appropriate documentation as specified in the EPA regulations in unexecuted form to the EPA Regional Office along with your permit application. Existing facilities must submit executed documentation to EPA before the permit will be issued. New facilities must submit the executed documentation to EPA 60 days before hazardous waste is first received at the new facility. You must submit one of the following documents, with wording of the documents identical to the wording specified in the regulations:



- o a certificate of insurance;
- o a liability endorsement; or
- o a letter from your firm's chief financial officer, and a special report and a report of examination from an independent certified public accountant.

If you have any questions on the above, please contact Gary Gosbee of my staff at (617) 223-1591.

Sincerely yours,



Dennis A. Huebner, Chief  
State Waste Programs Branch

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA RECORDS CENTER  
FACILITY OLIA HUNT SPECIALTY  
I.D. NO. RID 095976544  
FILE LOC. R-1B  
OTHER CALIF.

Mike - RCRA

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert Matte  
Hunt Philip Chemical Corp.  
1 Wellington Road  
Lincoln Rhode Island 02865

Re: EPA I.D. No. RID095976544

Dear Mr. Matte:

The Resource Conservation and Recovery Act (RCRA) requires each person owning or operating a hazardous waste treatment, storage or disposal facility to have a permit issued pursuant to Section 3005 of RCRA. Since November 19, 1980, your facility has been operating under interim status pending final administrative disposition of your permit application. In order to complete the consideration of RCRA permit applications, the Environmental Protection Agency (EPA) regulations at 40 CFR § 122.22 provide the EPA with the authority to request the submission of a Part B permit application.

Accordingly you are hereby required to submit within six (6) months of receipt of this request a complete permit application to EPA, Region I, RCRA Permits, P.O. Box 8748, Boston, Massachusetts 02114. The information required for submittal is set forth in 40 CFR § 122.25 and published in the following Federal Registers:

Volume 45, Monday, May 19, 1980, pages 33434 and 33435 - General Information Requirements

Volume 46, Monday, January 12, 1981, pages 2889 thru 2892 inclusive General information requirements including location, closure and post closure, and specific information requirements for containers, tanks, storage surface impoundments and waste piles

Volume 46, Friday, January 23, 1981, pages 7681 - specific information requirements for incinerators

In addition I have enclosed information sheets which may be used as a guide when preparing a permit application for the various types of hazardous waste storage and treatment facilities.

If you wish to submit any of the information required under a claim of confidentiality please refer to 40 CFR Part 2 for the proper procedures.

CONCURRENCES							
SYMBOL							
SURNAME	FRB	GAH					
DATE	3-8-82	3/8/82					



The State of Rhode Island also has existing facility permitting regulations, and may be calling for your firm's full permit application in the near future. It is EPA's and the Rhode Island Department of Environmental Management's (DEM) goal to closely coordinate the review of your permit application in order to reduce to the minimum any duplicative information gathering activity. In keeping with this goal, you are urged to attend a State-EPA-Industry conference which has been scheduled for March 17th and 24th. During the conference, the permit application process will be explained in detail. The conference will be held at 10:00 a.m. in the auditorium of the Cannon Health Building, 75 Davis Street, Providence, Rhode Island. The conference agenda will be as follows:

- 10 a.m. - noon        - General Presentation by State and EPA
- 1 p.m. - 3 p.m.    - Specific questions from industry will be answered.

Should you have any questions about the application requirements, please contact Frank Battaglia at our Boston Regional office. Telephone (617)223-0240 or 0241.

For questions concerning the conference arrangements, please contact John Spirito of the Rhode Island Department of Environmental Management at (401)277-2797.

Sincerely,

John R. Moebes  
Chief, Permits Branch

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RCRA RECORDS CENTER  
 FACILITY OLIN HUNT SPECIALTY  
 I.D. NO. RID 095976544  
 FILE LOC. R-1A  
 OTHER NPA

11/22/82

Mr. Robert Matte  
 Philip A. Hunt Chemical Corporation  
 Industrial Circle  
 1 Wellington Road  
 Lincoln, Rhode Island 02865

RE: EPA I.D. # RID095976544

Dear Mr. Matte:

EPA has completed its review of your permit application to treat/store/dispose of hazardous waste under the Resource Conservation and Recovery Act ("RCRA"). From the information provided in your application and in your letter of September 2, 1982 and letters from your Consultant, AE & T, dated September 2, 1982, September 15, 1982, it appears that the facility does not require a RCRA permit under Section 3005 of the Act, in accordance with 40 CFR Part 122.21(d)(2)(i). Under this section, a generator is allowed to accumulate hazardous waste on-site for up to 90 days, in accordance with 40 CFR Part 262.34, without a RCRA permit.

EPA is returning your application since the information contained therein does not demonstrate that the facility is required to obtain a permit under Section 3005 of RCRA. If EPA's interpretation of the application is incorrect or if the application itself is incorrect and the facility is in fact one which is required to have a permit under Section 3005 of the Act, a complete RCRA Part A Application (EPA Forms 3510-1 and 3510-3) must be completed and resubmitted to this office by 12/27/82. If hazardous waste is handled at the facility referenced above and the applicant fails or refuses to submit a complete Part A application within this period appropriate enforcement action may be taken.

This letter will also serve to cancel EPA's request of March 10, 1982 for the submittal of Part B of the RCRA permit application.

bcc: Gerry Levy

RAC/11/10/14-82

## CONCURRENCES

SYMBOL	<i>WHL</i>						
SURNAME	<i>RAC</i>	<i>R. Bryant</i>	<i>Huebner</i>				
DATE	<i>10-15-82</i>	<i>11/9/82</i>	<i>11/12/82</i>				



If you have any questions, or need any assistance, please contact Richard Cavagnero at (617)223-5630.

All replies should be addressed to:

U. S. Environmental Protection Agency  
State Waste Programs Branch  
Room 1903  
JFK Federal Building  
Boston, Massachusetts 02203

Sincerely yours,

Dennis A. Huebner, Chief  
State Waste Programs Branch

cc: R.I. DEM  
A E & T